

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUBREY DRAKE GRAHAM,  Plaintiff,  v.  UMG RECORDINGS, INC.,  Defendant.	: : : : : : : :	No. 1:25-cv-399-JAV
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**DECLARATION OF M. ANNIE HOUGHTON-LARSEN IN SUPPORT OF  
PLAINTIFF’S MOTION FOR LEAVE TO A RULE 45 SERVE SUBPOENA ON THIRD  
PARTY KOJO MENNE ASAMOAH BY ALTERNATIVE MEANS**

I, M. Annie Houghton-Larsen, an attorney admitted to practice in this Court, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am counsel to Plaintiff Aubrey Drake Graham (“Plaintiff”) in the above-captioned action.
2. I submit this declaration in support of Plaintiff’s Motion for Leave to Serve A Rule 45 Subpoena on Third Party Kojo Menne Asamoah (“Mr. Asamoah”) by Alternative Means (the “Motion”).
3. Plaintiff’s counsel is not aware that Mr. Asamoah is represented by counsel in the above-captioned case.
4. Shortly after the commencement of discovery in this action, Plaintiff began serving discovery requests, including through the issuance of Rule 45 subpoenas to third parties.

5. On or about March 14, 2025, Plaintiff, by and through counsel, issued a subpoena for the production of documents to Mr. Asamoah (the “Subpoena”) and began making efforts to serve the Subpoena on him. A true and correct copy of the Subpoena is attached hereto as Exhibit 1.

6. On March 24, 2025, Plaintiff and UMG Recordings, Inc. (“Defendant”) exchanged initial disclosures. On June 2, 2025, Plaintiff served amended initial disclosures. A true and correct copy of Plaintiff’s amended initial disclosures dated June 2, 2025 is attached hereto as Exhibit 2. A true and correct copy of Defendant’s initial disclosures dated March 24, 2025 is attached hereto as Exhibit 3.

7. Plaintiff, by and through counsel, engaged a process server, Capitol Process Services, Inc. (“Capitol Process”) to serve the Subpoena on Mr. Asamoah. Capitol Process made repeated service attempts on Mr. Asamoah. A true and correct copy of the Affidavit of Due Diligence of Rebecca E. Short memorializing those service attempts is attached as Exhibit 4.

8. Plaintiff, by and through counsel, engaged Nardello & Co. (“Nardello”), an experienced private investigative firm, to conduct research, investigation, and service attempts in connection with the Subpoena. A true and correct copy of the Affidavit of Due Diligence of Timothy Gallagher memorializing those research, investigation, and service attempts is attached as Exhibit 5.

9. Despite repeated efforts to serve Mr. Asamoah at multiple locations over the course of many weeks at considerable cost to Plaintiff, Plaintiff has been unable to serve the Subpoena on Mr. Asamoah with the assistance of Capitol Process and Nardello.

10. As of the time of filing, Plaintiff’s counsel have not received any response from Mr. Asamoah regarding the Subpoena.

11. Plaintiff is not aware of Mr. Asamoah's actual place of business.

12. As part of Plaintiff's efforts to locate and serve Mr. Asamoah, Plaintiff obtained three email addresses believed to be associated with Mr. Asamoah: [kojo@hard.pink](mailto:kojo@hard.pink), [djvinylproductions@gmail.com](mailto:djvinylproductions@gmail.com), and [info@hard.pink](mailto:info@hard.pink). On May 1, 2025, Counsel for Plaintiff sent an email to each of these email addresses and did not receive any bounce-back (or response) from any of the three emails.

13. As of the date of this filing, Plaintiff has not been able to serve Mr. Asamoah with the Subpoena.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 14, 2025.

/s/ M. Annie Houghton-Larsen  
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